

COMPLAINT
(for non-prisoner filers without lawyers)

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2020 DEC -4 A 11:31

CLERK OF COURT

(Full name of plaintiff(s))

Eddie L. Hatch jr

Michelle Davis-Hatch

v.

Case Number:

20-cv-1791

(Full name of defendant(s))

The City of Milwaukee

Mayor Tom Barrett

Additional defendants list attached

(to be supplied by Clerk of Court)

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

4843 N. 25th street Milwaukee, WI 53209

(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant The City of Milwaukee and agents attached

(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)
and (if a person) resides at _____
(Address, if known)
and (if the defendant harmed you while doing the defendant's job)
worked for The City of Milwaukee 200E. Wells street rm201 Milwaukee, WI 53202
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

JURY TRIAL DEMANDED

This action is brought by Eddie L. Hatch jr, Michelle Davis-Hatch, ("Hatch family") (dba
NIGHT OWL SVS, LLC to enforce the Fair Housing Act, Title VIII of the Civil Rights
Act of 1968 , as amended by the Fair Housing Amendments Act of 1988 ("Fair Housing
Act"), 42 U.S.C. SS 3601 et,seq.

This Court has jurisdiction over this action pursuant to 28 U.S.C. SS 1331 and 1345
and 42 U.S.C. S 3612(o).

Venue is proper under 28 U.S.C. S 1391(b) because the actions giving rise to the
"Hatch family "allegations occurred in the Eastern District of Wisconsin and the subject
property is located in the Eastern District of Wisconsin.

Additional Defendants:

CASE NUMBER

JEFF HANEWALL- PRINCIPAL AT ENGBERG ANDERSON ARCHITECTS

320 E. BUFFALO ST SUITE500 MILWAUKEE,WISCONSIN 53202

VILLARD AVENUE BID#19

JEFF HANEWALL-CHAIRMAN OF VILLARD AVE BID#19

ANGELIQUE L. SHARPE-MANAGER OF VILLARD AVE BID#19 C/O HEDC BID#31

HAVENWOODS HEDC/BID #31 6161 N. 64TH ST.MILWAUKEE,WI 53218

STEPHANIE HARLING-EXECUTIVE DIRECTOR OF HAVENWOODS BID#31

1ST DISTRICT ALDERMANS OFFICE 200 E. WELLS ST. MILWAUKEE,WI 53202

ASHANTI HAMILTON- 1ST DISTRICT ALDERMAN

JAMES STARKS-1ST DISTRICT ALDERMANS ASSISTANT

ZAKURI S. FEARS-1ST DISTRICT ALDERMANS CHIEF OF STAFF

ANDREA PRATT-LEGISLATIVE ASSISTANT TO 1ST DISTRICT ALDERMAN

CINNAIRE SOLUTIONS 2E. MIFFLIN ST SUITE403 MADISON,WI 53703

CHRISTOPHER LAURENT SVP,BUSINESS DEVELOPMENT PRESIDEN CINNAIRE
SOLUTIONS.

JAMES DOW-UNDERWRITING ANALYST/CINNAIRE

NWSCDC-4201 N.27TH ST 7TH FL MILWAUKEE, WI 53216

WILLIE SMITH-EDFP DCFI DIRECTOR NWSCDC/BID#19MEMBER

HOWARD SNYDER-NWSCDC EXECUTIVE DIRECTOR-RETIRED

Additional Defendants:

CASE NUMBER

DEPARTMENT OF CITY DEVELOPMENT (DCD) 809 N. BROADWAY MIL-WI 53202

DWAYNE K. EDWARDS-PROGRAM MANAGER (DCD)

MATT HAESSLY-REAL ESTATE SPECIALIST (DCD)

AMY E.TURIM-REAL ESTATE DEVELOPMENT SERVICES MANAGER(DCD)

KEN LITTLE-COMMERCIAL CORRIDOR MANAGER(DCD)

MARTHA BROWN-DEPUTY COMMISSIONER(DCD)

VANESSA KOSTER-PLANNING MANAGER(DCD)

AMY E. TURIM

The Hatch family, while growing its home based business,(Night Owl Services,Ilc.) was working with the Department of City Development for 2+ yrs to purchase a City owned commercial building to expand its operation by creating a training facility and incubator for entrepreneurs in the food service industry. In October 2018 the perfect opportunity presented itself. Mr. Dwayne K. Edwards met with Eddie Hatch at the property located at 3310 W. Villard ave in Milwaukee, Wisconsin. After inspecting the property, Mr. Edwards ask "if this would work?" I stated "yes, its just what we've been waiting for"! He said "great"! I told him I would get the proposal to him ASAP! As I and the two other interested parties where about to leave, Mr. Edwards touched my arm as I was walking away and stated, " This ones yours". I asked him earlier upon arrival if there would be any games played? He said "no". Again, as I was leaving after speaking to my broker about the property and his comment, he stopped me again and stated "its your time now"! DCD entertained offers from several black entrepreneurs in our community while DCD employees ,Executive Director of Havenwood BID, Chairman and managers of The Villard ave BID#19, A principle at Engberg Anderson Archtitects,1st District Alderman and staff memebbers, principles at NWSCDC, and Mr. Christopher Laurent of Cinnaire Solutions, a white, unfunded developer, was given unfair support and privilege in the acquisition of the subject property. We were also suffered defamatory harm to selection committee about our preparedness and in a public newsletter. There was a concerted effort by all to deny us the enjoyment and right to purchase this dwelling.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

Acquisition of the property concerned for 1\$

The funds to rehabilitate property and grounds to current codes and occupancy, vision

potential state. Working capital to hire and train staff comparable to our competitors

A transparent process from all City agencies and associates in future practices to video

record all meetings for open records request without prejudices.

The support of all current and future city agencies and associates in the support of

local entrepreneurs and potential employee's and their families as stated in their model

Preliminary Injunction on the sale, lease, demolition, etc of the dwelling in question.

Punitive damages to the Hatch Family in the amount of our best day of earnings times

each day lost since we placed our bid to purchase was harmed, until settled and paid.

A public acknowledgment of the harm done with apology from Common Council.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this _____ day of _____ 20____.

Respectfully Submitted,

 Michael D. Hatch
Signature of Plaintiff

414-659-2066

Plaintiff's Telephone Number

EHatch@Night Owl Services LLC.com
Plaintiff's Email Address

4843 N. 25th Street

Milwaukee, WI 53209
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

- ☐ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.
- ☒ I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.